

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS
EDUCATION FUND, *et al.*,

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC
COUNTY JUDGES AND COUNTY
COMMISSIONERS, *et al.*,

Movant-Intervenors,

v.

STATE OF TEXAS, *et al.*,

Defendants.

TRUE THE VOTE,

Movant-Intervenor.

Civil Action No. 2:13-cv-263 (NGR)

TEXAS STATE CONFERENCE OF NAACP
BRANCHES, *et al.*,

Plaintiffs,

v.

JOHN STEEN, *et al.*,

Defendants.

Civil Action No. 2:13-cv-291 (NGR)

DECLARATION OF PEGGY DRAPER HERMAN

Pursuant to 28 U.S.C. § 1746, I, Peggy Draper Herman, declare as follows:

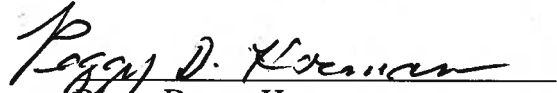
1. I live in San Antonio, Texas and I am registered to vote in San Antonio, Texas.
2. I am ninety years old and I am a longtime Texas voter.
3. I did not vote in the elections on November 5, 2013 because I did not have one of the forms of identification required to vote under the new Texas voter ID law.
4. I tried to obtain an election identification certificate (EIC) in advance of the elections, but I was unable to because I did not have proof of my citizenship.
5. I am a United States citizen, but I was born in England ninety years ago. My father brought me to the United States, through Ellis Island, as a baby in 1923. Ellis Island was shut down in 1924. The only document I have is a little piece of paper that says my father and his daughter are United States citizens, but I cannot verify what the document is because it is only part of the page and it is an old piece of paper.
6. At one point, the government verified my U.S. citizenship because I was issued a U.S. passport. That was over thirty years ago and it is expired now. I used it to go visit friends abroad with my husband. I have been looking for it, so that I can verify my citizenship, but I cannot find it now because I have not used it in years. It never dawned on me that I would need it to prove my citizenship or identity.
7. I went to the Department of Public Safety office to try to obtain an election ID. I was told I could not get the ID without proof of citizenship. I was then told to go to the main post office to try to get help verifying my citizenship.
8. My friend and I then went to the main post office. Since I do not walk very well anymore, my friend went in first to find out how long it would take. The room was filled with people. The people working at the post office also informed my friend that there was a long waiting list, that they were not sure when they would get to me, and they were not sure if they would even get to me before the close of business that day. Because there was no place to sit and, even so, because I cannot sit for long periods of time, I had to leave.
9. I am fortunate because I have good transportation, good friends who will help me, and a church that helps support me financially. But I am not able to get around very easily

anymore. I am dependent on a lot of people and it was a huge burden for me to try to get an ID, which I was not even able to get.

10. I did not try to vote on Election Day because I did not have the required ID. People encouraged me to try to go vote to see if the poll officials would let me vote anyways, but I felt it was too difficult for me to go vote if I did not know that they would let me vote. I am just not able to get around very easily anymore. I also did not want to be embarrassed at the polls if they told me I could not vote.

I declare, under penalty of perjury, that the foregoing is true and correct.

Executed on this 21ST day of November, 2013.


Peggy Draper Herman